

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

MEMORANDUM

4/28/2022

SUBJECT: Product Chemistry Review for
VodaGuard C Algaecide, EPA Reg. No. **95535-1**;
Case # **00340959**

FROM: Sergey Alekseyev, Chemist
Product Science Branch, CT Team

THROUGH: Erik Kraft, Branch Chief
Regulatory Management and Science
Branch
Antimicrobials Division (7510P)

For E. Kraft 4/29/2022

THROUGH: Erik Kraft, Branch Chief
Chemistry and Toxicology Team
Regulatory Management and Science Branch
Antimicrobials Division (7510M)

TO: John Hebert/Emilia Oigenblik
PM Team 33
Regulatory Management Branch I
Antimicrobials Division (7510P)

Registrant: **Amvodaguard Inc.**

Action code: **(575)** Conditional
Registration Follow-up; Data Required;
Requires Science

Agency Due Date: **5/25/2022**

Case No. **00340959**

DP No.

Submission No.:

E-Sub No.:

Classification: EUP

Process: **a non-integrated system**

Pesticide classification: antimicrobial,
algaecide

MRID(s): 518085-01

PC Code	CAS No.	Name	% by wt.
024401	7758-99-8	Copper sulfate pentahydrate	96.0
		Other ingredients	4.0

I. BACKGROUND

The registrant, Amvodaguard Inc., requested reviewing of Storage Stability and Corrosion Characteristics studies for registration of the product **VodaGuard C Algaecide**, Reg. No. **95535-1**.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Amendment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-27 – Formulator's Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-34 – Certification with respect to citation of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Basic CSF, dated 11/20/2019	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Label, dated 07/02/2021	<input checked="" type="checkbox"/>	<input type="checkbox"/>
REFERENCED:	--	

III. FINDINGS

CONFIDENTIAL STATEMENT OF FORMULA

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		

Active Ingredients(s)	Nominal	Upper limit	Lower limit
Copper sulfate pentahydrate	96.03*	—	—
	YES	NO	N/A
1. The certified limits of the active ingredients are within 40 CFR standard certified limits.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. All ingredients are approved for food pesticide formulations.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* - value of nominal content on the CSF does not coincide with that on the label. Certified limits for the active ingredient have not been presented in the CSF.

b. Product Label:

	YES	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. If yes to 2-6, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Additional Findings

1. Storage Stability study included assessment of the active ingredient content after 0, 3, 6, 9, and 12 months at 20 °C. Corrosion Characteristics study included assessment of weight changes and signs of corrosion attack on commercial containers after 0, 3, 6, 9, and 12 months at 20 °C.

2. Procedure of Storage Stability assessment included dissolving of samples in hexanes. The dispersant was soluble, the active ingredient was not. The amount of dry residual has been measured and tested. Therefore, the procedure pertained to the active ingredient, not the product itself. By this reason the study does not respond requirements of Guideline 830.6317.

3. Corrosion Characteristics study has been conducted using coupons which were cut out of interior lining of the commercial container (50 lbs. bag). Said coupons were used for storage of the subject product samples. Weight changes were equal 0.05, 0.05, 0.03, and 0.12% after 3, 6, 9, and 12 months, respectively. No signs of corrosion attack have been found. Procedure of this study satisfied requirements of Guideline 830.6320.

V. Conclusion

The Regulatory Management and Science Branch has determined, that the registrant will satisfy the requirements for Storage Stability study needed for registration of the product **VodaGuard C Algaecide**, reg. no. **95535-1** after submission of said study conducted for the subject product, see Additional Finding 2. The registrant study has satisfied the requirements for Corrosion Characteristics needed for registration of the product **VodaGuard C Algaecide**, reg. no. **95535-1**.